

**MHSA Behavioral Health**  
**Electronic Health Record (EHR) EHR and PHR Criteria**  
**2nd Draft - Response to Public Comments**

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Category	Criteria Number	Name	Organization	Comment	Action
F-06	6.006	Donnelly Smith	Echo	Raises the question to clarify the intent of this criteria. Data is in standard coded form and there is data NOT in standard coded form. What about capturing data NOT in standard form that is necessary in representing the clients history	
		Ron Smith	San Bernardino	May want to include Data NOT in standard codes and that will provide data in text field.	
F-24	24.004				
F-24	24.005				
F-24	24.015				
I-01	1.001				
I-01	1.002				
I-01	1.003	Memo Keswick, Natalie Courson	DMH, Alameda County	Typo error "respond". Natalie also brought up the question if the PHR will also have the capability to have lab data shared from EHR to PHR for clients to view?	
I-01	1.004				
I-01	1.005	Bernard Sklar	Alameda County	Bernard: raised question - Should the system require the vendors to include Capability (not necessarily Automatic) to share any and all information - EHR to PHR	
I-02	2.001				
I-02	2.002				
I-02	2.003				
I-03	3.001				
I-03	3.002	Ron Smith	San Bernardino County	The term "respond" - what does this mean? What's meant by "respond"?	
I-03	3.003				
I-03	3.004				
I-03	3.005				
I-03	3.006				
I-03	3.007				
I-03	3.008				
I-03	3.009				
I-04	4.001				
I-04	4.002				
I-04	4.003				

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I-04	4.004				
I-04	4.005				
I-04	4.006				
I-04	4.007				
I-04	4.008				
I-04	4.009				
I-04	4.010	Ron Smith, Karen Hart, Bernard Sklar	San Bernardino County, United Advocates for Children of Calif, Alameda County	Ron: What criteria would be in PHR that would not be in EHR? Karen suggested that the client may want to have comments or client history in their PHR that they would want to export from PHR to EHR. Bernard: agrees with Karen's comment. Ron asked would this information be imported from other sources. Clarified that PHR is client or family member input and controlled.	
I-05	5.002				
I-06	6.001				
I-06	6.002				
I-06	6.003	Ron Smith, Karen Hart, Bernard Sklar and Memo Keswick	San Bernardino County, United Advocates for Children of Calif, Alameda County, DMH	Ron: Good Idea; Quality improvement issue, system of care reports should be user-defined; needs a fair amount of end-user control over the data reported back. Karen: what would be developed and incorporated on state-level. Ron: Data sets need to be particular to the type of user - state versus county. Bernard: clarified. Memo: paraphrase if QI is well constructed and well-defined it will be flexible enough to be used appropriately.	
I-07	7.001				
I-07	7.002	Natalie Courson	Alameda County	What does this mean? Send query to "Where"? From "Where"?	
I-07	7.003				
I-07	7.004				
I-07	7.005				
I-07	7.006				
I-07	7.007				
I-07	7.008				
I-07	7.009				
I-07	7.01				
I-07	7.011				
I-07	7.012				
I-07	7.013	Karen Hart	United Advocates for Children of Calif	Asked what the shading references? This section seems to contain over arching criteria.	
I-07	7.014				
I-07	7.015				

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		Name	Organization	Comment	Action
I-07	7.016				
I-07	7.017				
I-07	7.018				
I-07	7.019				
I-07	7.020				
I-07	7.021				
I-07	7.022				
I-07	7.023				
I-07	7.024				
I-07	7.025				
I-07	7.026				
I-07	7.027				
I-07	7.028				
I-07	7.029				
I-07	7.030				
I-07	7.031				
I-07	7.032				
I-07	7.033	Karen Hart	United Advocates for Children of Calif	End ...This section; there are many over arching criteria	
I-07	7.034				
I-07	7.035				
I-07	7.036				
I-07	7.037	Bernard Sklar, Memo Keswick	Alameda County, DMH	Asks what "deprecate" may refer to...Memo suggested it is the ability to handle/down-level terminology Bernard: Looked up deprecation in Wilkipedia means superseded, should be avoided, and features that are still there but should be taken out later.	
I-07	7.038				
I-07	7.039				
I-07	7.040				
F-06	6.005	Karen Hart	United Advocates for Children of Calif	Replicate comments made for 6.006	
F-06	6.014				
I-03	3.010				
I-03	3.011				
I-04	4.011	Natalie Courson	Alameda County	What does this mean? Are there or are there not discrete data elements referenced in these requirements? See 5.001 comments	

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I-05	5.001	Natalie Courson, Karen Hart, Ron Smith	Alameda County, United Advocates for Children of Calif, San Bernardino County	Not sure if this is part of the EHR? Karen: commented that this bothers her, because she thinks this is saying that PHR have capability to do this, but who will have the control of the sharing of this information be in client's care. Make sure this is understood that in regards to PHR - that it should have the ABILITY of sharing this information IF the client chooses to do so. The term "Shall receive" means ability, but is not automatic and in control of client and family member. Ron: concerned about possiblity of bad/incorrect data corrupts the PHR. Karen: concerned that in IT MHSA - that the clients concerns are not being brought forward; Karen very concerned that clients and family members do not have enough voice. Karen feels DMH needs to do more outreach for this component - she does not feel enough has been done by DMH. Suggested that CiMH IT Conference 2008 scholarship receipents be included (ask Tom Trabin regarding engaging their participation).	
I-05	5.006				
I-05	5.007				
I-05	5.008	Karen Hart	United Advocates for Children of Calif	Reference Public Health Data...is this part of this, karen does not see it in here? Has this been included in this? Raises the feedback on PHR Survey headed by Tom Trabin that most clients comment is that they were not comfortable with AUTOMATICALLY sharing their information to Public Health departments.	
F-03	moved				
F-04	moved				
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F-30	moved				
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F-43	moved				
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S-01	moved				
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S-04	moved				
S-04	moved				
General Comments		Donna Yim	San Joaquin County	Is there a place where imaging is mentioned? Pointed out 1-2 2.001 etc	
		Bernard Sklar, Karen Hart	Alameda County, United Advocates for Children of Calif	Bernard: raised question - Should the system require the vendors include Capablity (not necessarily Must) to share any and all information. From EHR to PHR.	
		Bernard Sklar	Alameda County	Does this whole process apply to DMH or toward the national standards?	
		Lisa Scott-Lee	Sacramento County	Hopes there is a compliance effort in this process required by DMH - that compliance related data elements are standardized? Hopes there is a uniform compliance definition in DMH EHR/PHR requirements.	
		Natalie Courson	Alameda County	Lab data needs to be shared from EHR to PHR for client viewing.	